

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

JOHN SAIN, *et al.*,*Plaintiffs,**v.*BRYAN COLLIER, *et al.*,*Defendants,*

Case No. 4:18-cv-04412

**EXHIBITS IN SUPPORT OF
MOTION FOR SUMMARY JUDGMENT ON BEHALF OF
DEFENDANTS BRYAN COLLIER, JAMES MCKEE, AND
THE TEXAS DEPARTMENT OF CRIMINAL JUSTICE**

Exhibit	Description
Exhibit A	Three Year Plan: including Administrative Directive 10.64, Excessive and Extreme Temperature Conditions in the TDCJ and 2018 Seasonal Preparedness Directive, with Affidavit from Jason Clark
Exhibit B	Expert Report of Dr. Dean Rieger
Exhibit C	Offender Heat Sensitivity Scores, includes heat sensitivity scores with affidavits for John Sain, David Cummings, Phillip Gullet, Thyee McGruder, Jerry Smith, David Wilson, Eugene Boston, Salvador Capuchino, and Jesse Snearly
Exhibit D	Affidavit Regarding Heat Related Illnesses at Luther Unit
Exhibit E	Affidavit Regarding Offender Population at Luther Unit
Exhibit F	2019 Seasonal Preparedness Directive, with business records affidavit
Exhibit G	Affidavit of Fernando Fuster
Exhibit H	Affidavit of Warden McKee
Exhibit I	Luther Unit Orientation Handbook, with business records affidavit

Exhibit J	Officer Heat Training Video [DVD of video submitted to the Court by mail]
Exhibit K	Offender Heat Training Video in English and Spanish [DVD of video submitted to the Court by mail]
Exhibit L	2016 Employee and Offender Heat Training Acknowledgments, with business records affidavit, protected information redacted
Exhibit M	2017 Employee and Offender Heat Training Acknowledgments, with business records affidavit, protected information redacted
Exhibit N	2018 Employee and Offender Heat Training Acknowledgments, with business records affidavit, protected information redacted
Exhibit O	Carry-On-Person Heat Card
Exhibit P	Photos of the O.L. Luther Unit with Affidavit of Crystal Brantley
Exhibit Q	I-204 Offender Flyer, with business records affidavit
Exhibit R	O.L. Luther Unit Excessive Heat Checklist for 2018, with business records affidavit
Exhibit S	AD-02.15 "Operations of Emergency Action Center and Reporting Procedures for Serious or Unusual Incidents," with business records affidavit
Exhibit T	Correctional Managed Health Care Policy A -08.4 Medical and Mental Health Classification, with business records affidavit
Exhibit U	Correctional Managed Health Care Policy A -08.4 Medical and Mental Health Classification Attachment A, with business records affidavit
Exhibit V	Correctional Managed Health Care Policy D-27.2 Heat Stress, with business records affidavit
Exhibit W	Correctional Managed Health Care Policy D-27.3 Photo Sensitivity, with business records affidavit
Exhibit X	Affidavit of Shawn Pinney Regarding Transport Vehicles
Exhibit Y	Luther Electrolyte Sale Summary
Exhibit Z	Affidavit of Kevin Grizzle regarding power at the Luther Unit with O.L. Luther Unit Incident Management Plan Utility Failure Checklist
Exhibit AA	Affidavit Regarding Luther Unit Generator List
Exhibit BB	Emergency Action Center Records for I-08076-05-16, with business records affidavit
Exhibit CC	Emergency Action Center Records for I20958-12-18, with business records affidavit
Exhibit DD	Luther Unit Maintenance Work Orders, with business records affidavits
Exhibit EE	Inter-Office Communication to Luther Unit Staff and Offenders regarding Respite Areas, dated May 17, 2018, with business records affidavit
Exhibit FF	Estimated Cost to Install Air-Conditioning at the Pack Unit with business records affidavit

Exhibit GG	Estimated Cost to Maintain Air-Conditioning at the Pack Unit, with business records affidavit
Exhibit HH	Offender Orientation Handbook, with business records affidavit
Exhibit II	Affidavit from Vickie Barrow that there are No Offender Grievance Records for Eugene Boston
Exhibit JJ	Affidavit from Vickie Barrow that there are No Offender Grievance Records for Jesse Snearly
Exhibit KK	Affidavit from Vickie Barrow that there are No Offender Grievance Records for Jerry Smith

Exhibits Filed Under Seal

Defendants have moved to file the following documents under seal as they contain sensitive and confidential medical information and information that may present a security risk to the named plaintiffs, so the information should not be made part of the public record. These documents will only be released to the Plaintiffs who have a right of access to such documents.

Exhibit	Description
Exhibit LL	Affidavit of Debra Gibbs Regarding Transferred Offenders
Exhibit MM	Autopsy Report for Inmate C.
Exhibit NN	Relevant Medical Records for Inmate C., with business records affidavit
Exhibit OO	Luther Unit Heat Related Illnesses for 2016-2018, with business records affidavit
Exhibit PP	Relevant Medical Records of John Sain, with business records affidavit
Exhibit QQ	Relevant Medical Records of David Cummings with business records affidavit
Exhibit RR	Relevant Medical Records of Thyee McGruder, with business records affidavit
Exhibit SS	Relevant Medical Records of Salvador Capuchino, with business records affidavit
Exhibit TT	Offender Grievance Records for John Sain, with business records affidavit
Exhibit UU	Offender Grievance Records for Salvador Capuchino, with business records affidavit
Exhibit V V	Offender Grievance Records for Thyee McGruder, with business records affidavit